

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AMERICAN COUNCIL OF LEARNED
SOCIETIES, et al.,

Plaintiffs,
v.

MICHAEL MCDONALD, in his official
capacity as Acting Chairman of the National
Endowment of the Humanities, et al.,

Defendants.

Case No. 1:25-cv-03657

PROPOSED ORDER GRANTING MOTION FOR A PRELIMINARY INJUNCTION

The Court, having reviewed the parties' filings, it is hereby **ORDERED** that Plaintiffs' Motion for a Preliminary Injunction is **GRANTED**. It is further

ORDERED that Defendants are preliminarily enjoined from enforcing and giving effect to their decisions to eliminate or nearly eliminate entire National Endowment for the Humanities ("NEH") divisions, to shut down entire programs, to mass fire staff, and to delay spending or outright refuse to spend the funds appropriated to NEH by Congress; it is further

ORDERED that Defendants are preliminarily enjoined from enforcing or giving effect to the termination notices Plaintiffs' grants and the grants of Plaintiffs' members; it is further

ORDERED that Defendants are preliminarily enjoined to obligate and spend the full amount of funds that Congress has appropriated to NEH, including for NEH grants, without intentional delay.

Dated: _____

The Honorable Colleen McMahon
United States District Judge